

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

NELSON L. BRUCE,

Plaintiff,

v.

CARRINGTON MORTGAGE SERVICES, LLC

Defendant.

Case No. 2:17-CV-2171

**DEFENDANT CARRINGTON MORTGAGE SERVICES, LLC's
MOTION TO ENLARGE TIME TO RESPOND TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION**

Defendant, Carrington Mortgage Services, LLC (“Defendant”), through undersigned counsel, respectfully moves for a thirty-day enlargement of time to respond to Plaintiff Nelson L. Bruce’s (“Plaintiff”) first set of interrogatories and first requests for production of documents (“Discovery Requests”).

1. Plaintiff served discovery requests on Defendant’s counsel by mail on February 20, 2018. The current deadline for Defendant to respond to Plaintiff’s discovery requests is March 26, 2018. This is the first extension requested to respond to Plaintiff’s discovery requests.

2. Plaintiff’s discovery requests seek, among other things, information regarding Defendant’s telephone dialing systems. Defendant needs additional time to consult with individuals with knowledge of those systems and prepare responses to the requests, and requests an extension of thirty (30) days through April 25, 2018.

3. The discovery cut-off date is June 8, 2018 under the current scheduling order in this matter. Accordingly, no amendment to the scheduling order is required as a result of

granting the relief set forth in this motion, and no party will be prejudiced as a result of the requested extension.

WHEREFORE, Defendant Carrington Mortgage Services, LLC respectfully requests that the Court grant an additional thirty (30) days for Defendant to respond to Plaintiff's written discovery requests, and for such other and further relief as the Court deems proper.

Respectfully submitted this 22 day of March, 2018.

BRADLEY ARANT BOULT CUMMINGS LLP

/s/ G. Benjamin Milam

G. Benjamin Milam (SC Bar No. 80311)

214 N. Tryon Street, Suite 3700

Charlotte, NC 28202

T: 704.338.6000

F: 704.338.6080

bmilam@bradley.com

*Attorney for Defendant Carrington Mortgage
Services, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the parties listed below by depositing a copy thereof in the United States Mail, postage pre-paid and addressed as follows:

Nelson L. Bruce
144 Pavilion Street
Summerville, SC 29483

This 22nd day of March, 2018.

/s/ G. Benjamin Milam
G. Benjamin Milam